



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JAM/CRH/MS
F. #2021R01110

*271 Cadman Plaza East
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By ECF and Email

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Re: United States v. Yevgeniy Grinin et al.
Criminal Docket No. 22-409 (S-2) (HG)

Dear Counsel:

Please find, at the USAfx file exchange location provided to you via email, materials that are being produced in accordance with the government's discovery obligations. These materials are being produced pursuant to the Supplemental Protective Order in this matter. See ECF No. 81. Pursuant to that Order, some of the items have been marked as "Sensitive Discovery" and should be handled accordingly. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Please find enclosed the following materials¹:

Description	Bates Begin	Bates End
Department of Treasury document	529	536
Search warrant and associated materials, No. 22-MJ-588 (Sensitive Discovery)	537	569
Photographs related to search warrant, No. 22-MJ-588 (Sensitive Discovery)	570	579
Documents related to search warrant, No. 22-MJ-588 (Sensitive Discovery)	580	585
Report of interview (Sensitive Discovery)	586	588
Consent to Search Form (Sensitive Discovery)	589	589
Advice of Rights Form (Sensitive Discovery)	590	590
Fingerprint Card – Vadim Yermolenko	591	592
Receipt of Passport – Vadim Yermolenko	593	593
Documents associated with interview (Sensitive Discovery)	607	623
Report of interview (Sensitive Discovery)	624	624
Business records (Sensitive Discovery)	625	636
Evidence Log and Property Receipt – 30 Ellis Drive, Merrimack, NH	637	639
Electronic communications (Sensitive Discovery)	640	660

¹ Please note that Bates ranges 000594-000606, 000726-000727, 000831-000847, 000851 and 000911-000927, 001423-001432 were intentionally left blank.

Description	Bates Begin	Bates End
Photographs – 30 Ellis Drive, Merrimack, NH	661	670
Photograph Log – 30 Ellis Drive, Merrimack, NH	671	679
Report of interview (Sensitive Discovery)	680	683
Documents and records associated with interview (Sensitive Discovery)	684	706
Report of interview (Sensitive Discovery)	707	709
Report of Investigation and associated records (Sensitive Discovery)	710	725
FedEx records	728	728
Venmo records	729	730
TD Bank records	731	761
Yahoo records	762	764
Deutsche Bank records	765	765
PayPal records	766	768
Bank of New York Mellon records	769	769
Federal Reserve Bank of New York records	770	770
Barclays records	771	771
HSBC records	772	830

Description	Bates Begin	Bates End
Apple records	848	848
JP Morgan Chase Bank, N.A. records	849	849
Citibank records	850	850
FedEx records	852	852
Standard Charter records	853	853
WhatsApp records	854	857
Google records	858	859
Yahoo records	860	860
Google records	861	863
DHL records	864	864
UPS records	865	865
Google records	866	879
Yahoo records	880	880
Apple records	881	885
Microsoft records	886	895
Wells Fargo records	896	910

Description	Bates Begin	Bates End
eBay records	928	928
UPS records	929	929
PayPal records	930	930
TD Bank records	931	931
Wells Fargo records	932	1136
JPMorgan Chase Bank, N.A. records	1137	1250
PayPal records	1251	1312
Bank of America records	1313	1313
Google records	1314	1317
Dropbox records	1318	1319
eBay records	1320	1320
Apple records	1321	1321
PayPal records	1322	1383
Wells Fargo records	1384	1384
Experian records	1385	1388
Equifax records	1389	1420

Description	Bates Begin	Bates End
Wise US Inc. records	1421	1421
Transunion records	1422, 1433	1440

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Artie McConnell
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cc: Clerk of the Court (HG) (by ECF) (without enclosures)